



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*26 Federal Plaza
New York, New York 10278*

March 14, 2024

BY EMAIL & UNDER SEAL

The Honorable Stewart D. Aaron
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan - United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *United States v. Leonardo de Jesus Zuluaga Duque, et al.*, S1 24 Cr. 133 ()
 United States v. Maximilien de Hoop Cartier, et al., S2 24 Cr. 133 ()**

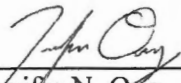
Dear Judge Aaron:

On March 7, 2024, a Grand Jury in the Southern District of New York returned two superseding indictments in the above-referenced case: S1 24 Cr. 133 (the "S1 Indictment") and S2 24 Cr. 133 (the "S2 Indictment"). That same day, the Clerk of the Court issued five arrest warrants pursuant to the S1 Indictment. The arrest warrants, however, should have been issued pursuant to the S2 Indictment. The Government apologizes for this error and respectfully requests that Your Honor authorize the Clerk of the Court to issue the five enclosed arrest warrants pursuant to the S2 Indictment.


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In addition, the Government anticipates requesting provisional arrests and extradition for five of the defendants from the S1 and S2 Indictments from a foreign government. Accordingly, the Government respectfully requests (1) a limited unsealing of the S1 and S2 Indictments and accompanying arrest warrants and (2) certified copies of the S1 and S2 Indictments to permit the Government to provide those documents to foreign government officials in connection with anticipated requests for the defendants' provisional arrest and extradition. We request that the S1 and S2 Indictments otherwise remain under seal until the Court grants a request to unseal or otherwise deems unsealing appropriate.

Respectfully submitted,
DAMIAN WILLIAMS
United States Attorney

by: 
Jennifer N. Ong
Assistant United States Attorney
(212) 637-2224

SO ORDERED:



HONORABLE STEWART D. AARON
UNITED STATES MAGISTRATE JUDGE

DATE: March 14, 2024